

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JANE DOE 1, individually, and on behalf of all  
others similarly situated, JANE DOE 2,  
individually and on behalf of all others similarly  
situated, JANE DOE 3, individually and on behalf  
of all others similarly situated, JANE DOE 4, individually  
and on behalf of all others similarly situated,  
JANE DOE 5, individually and on behalf of all others  
Similarly situated, and JANE DOE 6, individually  
and on behalf of all others similarly situated,

**NOTICE OF CROSS-MOTION**

Plaintiffs,

**Civil Action No: 1:23-cv-10301-AS**

v.

GOVERNMENT OF THE UNITED STATES VIRGIN  
ISLANDS, FIRST LADY CECILE DE JONGH,  
GOVERNOR KENNETH MAPP, SENATOR  
CELESTINO WHITE, ATTORNEY GENERAL  
VICENT FRAZER, GOVERNOR JOHN DE JONGH,  
SENATOR CARLTON DOWE, DELEGATE  
STACEY PLASKETT, and JOHN DOES 1-100,

Defendants.

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**PLEASE TAKE NOTICE** that, upon the accompanying Declaration of Jordan Merson  
and Memorandum of Law, both dated May 8, 2024, Plaintiffs, by and through their undersigned  
counsel, shall cross-move this Court at the Daniel Patrick Moynihan United States Courthouse,  
500 Pearl Street, New York, New York 10007, for an Order granting them leave to amend the First  
Amended Complaint (“FAC”), deeming the Second Amended Complaint (“SAC”) timely filed,  
and for leave to conduct discovery addressed to jurisdiction and venue, together with such other

and further relief as this Court deems just and proper.

Dated: May 8, 2024

New York, New York

Respectfully submitted,

**MERSON LAW PLLC**

By: /s/ Jordan Merson  
Jordan Merson, Esq.  
950 Third Avenue, 18<sup>th</sup> Floor  
New York, NY 10022  
Telephone: (212) 603-9100  
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[JMerson@MersonLaw.Com](mailto:JMerson@MersonLaw.Com)  
*Counsel for Plaintiffs*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JANE DOE 1, individually, and on behalf of all  
others similarly situated, JANE DOE 2,  
individually and on behalf of all others similarly  
situated, JANE DOE 3, individually and on behalf  
of all others similarly situated, JANE DOE 4, individually  
and on behalf of all others similarly situated,  
JANE DOE 5, individually and on behalf of all others  
Similarly situated, and JANE DOE 6, individually  
and on behalf of all others similarly situated,

Plaintiffs,

**Civil Action No: 1:23-cv-10301-AS**

v.

GOVERNMENT OF THE UNITED STATES VIRGIN  
ISLANDS, FIRST LADY CECILE DE JONGH,  
GOVERNOR KENNETH MAPP, SENATOR  
CELESTINO WHITE, ATTORNEY GENERAL  
VICENT FRAZER, GOVERNOR JOHN DE JONGH,  
SENATOR CARLTON DOWE, DELEGATE  
STACEY PLASKETT, and JOHN DOES 1-100,

Defendants.

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**DECLARATION OF JORDAN MERSON IN SUPPORT**

I, Jordan Merson, Esq., hereby declare as follows:

1. I am a member of the law firm Merson Law, PLLC and counsel for Plaintiffs in this  
action.

2. I make this Declaration in support of Plaintiffs' cross-motion for an Order granting  
them leave to amend the First Amended Complaint ("FAC"), deeming the Second Amended  
Complaint ("SAC") timely filed, and for leave to conduct discovery addressed to jurisdiction and  
venue, together with such other as this Court deems just and proper.

3. In support thereof, I annex:

Exhibit A – Proposed Second Amended Complaint;

Exhibit B – Protective Order issued in *USVI v. JP Morgan*, 22-CV-10904;

Exhibit C – USVI’s motion to strike affirmative defenses in *USVI v. JP Morgan*, 22-CV-10904;

Exhibit D - J.P. Morgan’s opposition to the motion to strike affirmative defenses; and

Exhibit E – Plaintiffs’ motion to intervene and for disclosure in *USVI v. JP Morgan*, 22-CV-10904.

Dated: May 8, 2024

New York, New York

Respectfully submitted,

**MERSON LAW PLLC**

By: /s/ Jordan Merson  
Jordan Merson, Esq.  
950 Third Avenue, 18<sup>th</sup> Floor  
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*Counsel for Plaintiffs*